



NEBRASKA GROCERY INDUSTRY ASSOCIATION, INC.

5533 South 27th Street, Suite 104

Lincoln, Nebraska 68512-1664

Telephone (402) 423-5533 • Fax (402) 423-8686 • Toll Free (800) 433-6742

March 30, 2006

Robert E. Feldman
Executive Secretary
Attn. Comments/Legal ESS
Room 3060
Federal Deposit Insurance Corporation
550 17th St N W
Washington, DC 20429

Dear Mr. Feldman,

On behalf of the Nebraska Grocery Industry Association and its members, I am writing this letter in regard to the application that Wal-Mart Stores, Inc. has made for federal deposit insurance for its proposed Utah industrial bank. I would strongly urge you to deny the application.

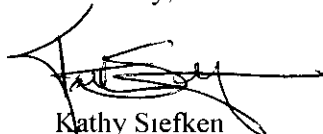
Our membership believes that approval of Wal-Mart's proposed ILC will create competitive inequities and an unlevel competitive playing field. If federal deposit insurance is granted for Wal-Mart's proposed bank, the playing field will be skewed even more than it already is. Of major concern is the possibility that Wal-Mart could amend their charter, then pursue the operation of retail branch banks outside of the supervisory framework of the Federal Reserve.

Having access to capital resources is very important to all businesses. We are concerned that a Wal-Mart bank will reduce the number of competitive sources of capital and financial services and this will adversely affect community businesses. If the world's largest retailer is permitted to open branch banks, then the separation of banking and commerce will no longer exist and this will allow an even greater concentration of the company's economic power. Independent businesses and the communities in which they reside will be harmed as a result.

We support the Gillmore-Frank Compromise (H.R. 3505) that the House of Representatives passed on March 8. The Compromise prohibits ILCs that are held by a commercial firm, from interstate branching. We would also encourage Congress to provide for consolidated supervision over ILC parent companies. Until Congress acts, FDIC should deny this application for federal deposit insurance on behalf of Wal-Mart's proposed Utah industrial bank.

We respectfully request that the FDIC deny Wal-Mart's application for federal deposit insurance.

Sincerely,



Kathy Siefken
Executive Director